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June 13, 2008

Hon. William H. Pauley III
District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Moon, Eung Ho v. United States of America
Docket No.: 08 Civ. 1990 (WHP)

Honorable Justice Pauley:

We write to you as attorneys for plaintiffs in the above matter.

In a telephone conference held on June 9, 2008, the parties agreed upon the following preliminary discovery schedule with respect to this action arising out a motor vehicle accident on May 30, 2006:


- a. Initial disclosures under Rule 26(a) shall be served by July 14, 2008.
- b. Requests for production of documents and interrogatories shall be served by July 14, 2008.
- c. Depositions of parties shall be completed by September 30, 2008.
- d. Discovery demands arising out of depositions shall be served within 30 days of the deposition.
- e. Defendant's medical examination of the plaintiff shall be completed by October 20, 2008.
- f. Expert reports shall be exchanged by November 15, 2008.
- g. Depositions of experts shall be completed by December 30, 2008

Hon. William H. Pauley III
June 13, 2008
-Page Two-

The parties recognize that this schedule may require modification, in accordance with issues which may arise during discovery.

Respectfully submitted,

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cc John D. Clopper, Esq.
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